

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

VANGUARD ENERGY, LLC

Plaintiff,

v.

GLOBAL ENTERPRISE SOLUTIONS,  
LLC and XD VENTURES, LLC,

Defendants.

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Civil Matter No.: 1:21-cv-00117

Jury Demanded

**FOURTH STIPULATION AND ORDER TO MODIFY AGREED SCHEDULING ORDER  
(DOC. 42) AND PRIOR STIPULATIONS AND ORDER (DOC.44 & DOC. 45)**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff and Counter-Defendant, Vanguard Energy, LLC (“Vanguard”), and Defendants and Counter-Plaintiffs Global Enterprise Solutions, LLC (“GES”) and XD Ventures, LLC (“XD”) (collectively “The Parties”), through their respective counsel of record, jointly submit the following Fourth Stipulation to Modify Agreed Scheduling Order to extend the deadlines pertaining to experts set by the Court as set forth in Agreed Scheduling Order (Doc. 42) and Stipulations and Order to Modify Agreed Scheduling Order (Doc. 44 and Doc. 45) in this case.

This Fourth Stipulation is made pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4).

The parties stipulate and agree to a short continuance of Defendant’s expert deadlines to allow more time to designate expert witnesses, prepare expert reports and evaluate what further discovery is needed to ready this case for trial. The Parties stipulate to extend the October 2, 2023 expert and report deadline pursuant to FRCP 26(a)(2)(D); Local Rule 9(A)(5) to Monday, October 16, 2023.

**STIPULATION**

WHEREFORE, IT IS STIPULATED AND AGREED BY AND BETWEEN THE PARTIES, that the following deadlines pertaining to experts are stipulated below.

<b>Deadline</b>	<b>Current Deadline</b>	<b>Stipulated Deadline</b>
Defendant's expert and report deadline: See FRCP 26(a)(2)(D); Local Rule 9(A)(5).	10/02/2023	10/16/2023

IT IS SO STIPULATED.

Dated: October 5, 2023.

Respectfully submitted,

**Butch Boyd Law Firm**

*/s/ Butch Boyd*

Butch Boyd (Lead Attorney)

State Bar No. 00783694

[butchboyd@butchboydlawfirm.com](mailto:butchboyd@butchboydlawfirm.com)

Jillian Scherrer

State Bar No. 24117793

[jillianscherrer@butchboydlawfirm.com](mailto:jillianscherrer@butchboydlawfirm.com)

2905 Sackett Street

Houston, TX 77098

713-589-8477 (Phone)

713-589-8563 (Fax)

***COUNSEL FOR DEFENDANTS AND  
COUNTER-PLAINTIFFS GLOBAL  
ENTERPRISE SOLUTIONS, LLC AND XD  
VENTURES, LLC***

Dated: October 5, 2023.

**Atlas Hall & Rodriguez LLP**

/s/ E. Michael Rodriguez \*with permission

E. Michael Rodriguez

State Bar No. 00791553

S. D. Tex. No. 18759

[mrodriguez@atlashall.com](mailto:mrodriguez@atlashall.com)

Eduardo Roberto Rodriguez

State Bar No. 00000080

S.D. Tex. No.1944

[errodriguez@atlashall.com](mailto:errodriguez@atlashall.com)

222 N. Expressway, Suite 203

Brownsville, Texas 78520

Telephone: (956) 574-9333

Facsimile: (956) 574-9337

***ATTORNEYS FOR PLAINTIFF, AND  
COUNTER-DEFENDANT VANGUARD  
ENERGY LLC***

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
ROLANDO OLVERA

UNITED STATES DISTRICT JUDGE